

FILED 15 NOV '24 11:20 USDC-ORE

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

District of Oregon

Eugene Division

**6:24-cv-01910-HZ**

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

James Thornton

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ NoTina Kotek, Gabe Fabrizio "See Attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

James Thornton

Street Address

200 East 2nd Str.

City and County

Cogville OR 97423 Coos county

State and Zip Code

NA

Telephone Number

NA

E-mail Address

NA

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name Tina Kotek  
Job or Title (if known) Governor  
Street Address 900 Court St. Suite 254  
City and County Salem  
State and Zip Code Oregon 97301-4096  
Telephone Number unknown  
E-mail Address (if known) unknown

## Defendant No. 2

Name Coos County Jail  
Job or Title (if known) Coos County Corrections  
Street Address 200 East 2nd Str.  
City and County Coquille - Coos  
State and Zip Code Oregon 97423  
Telephone Number NA  
E-mail Address (if known) unknown

## Defendant No. 3

Name Coos county Sheriffs Department  
Job or Title (if known) Sheriffs Office  
Street Address 250 N. Baxter Str.  
City and County Coquille OR 97423, Coos  
State and Zip Code /  
Telephone Number NA  
E-mail Address (if known) unknown

## Defendant No. 4

Name County OF Coos  
Job or Title (if known) County Office  
Street Address 250 N. Baxter Str.  
City and County Coquille Coos  
State and Zip Code Oregon 97423-1877  
Telephone Number unknown  
E-mail Address (if known) unknown



## Defendants List Continues

Name : Coos County Sheriff Gabe Fabrizio  
 Address : 250 N Baxter Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Capt. Mede  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Sgt. Gill  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Sgt. Shobar  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Sgt. Berger  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Tindall  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Bowen  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Thibault<sup>(32)</sup>  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Ward  
 Address : ~~600~~ 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Godin  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Vi Tek  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Cossey  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Lessley  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Trudi Lio  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Merchant  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Detzler  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Pearce  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877

Name : Coos County Sheriff Deputy Bradley  
 Address : 200 East 2nd Str.  
 City State Zip : Coquille OR 97423-1877



**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1, 4, 5, 6, 7, 8, 9 and 14th Amendments of the United States Constitution  
☒ **If the Basis for Jurisdiction Is Diversity of Citizenship**

**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) NA, is a citizen of the  
 State of (name) NA.

**b. If the plaintiff is a corporation**

The plaintiff, (name) NA, is incorporated  
 under the laws of the State of (name) NA,  
 and has its principal place of business in the State of (name)  
NA.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) NA, is a citizen of  
 the State of (name) NA. Or is a citizen of  
 (foreign nation) NA.

## Statement of Claim

Attached

The continued Discrimination and retaliation Done By All parties hereto continued misconduct and mistreatment to Thornton By Denying plaintiff his legal right to seek legal representation and refusing to provide Attorney information violates Thorntons 1, 6 Amendment rights secured by the US Constitution And Thornton's human Rights Artical 2, 5, 7, 8 and 10 The Known violations by defendants continues to Cause Thornton irreputable damages And injury that requires the redress by court.

The denial of Access to Law Library and materials violates thorntons 7, and 9 and 14th Amendment rights to US Constitution and his human rights Artical 3, 7, 8, 10, 11. These violations will continue to cause Thornton unnecessary rigor without redress From the Court and a preliminary Injunction put in place. All Defendants continue to retaliate by refusing access to Any legal material or Books even with it stated in the Jails inmate handbook of Allowing Access to Law Library with submitting a request on a Kite.



## b. If the defendant is a corporation

The defendant, (name) NA, is incorporated under  
 the laws of the State of (name) NA, and has its  
 principal place of business in the State of (name) NA.  
 Or is incorporated under the laws of (foreign nation) NA,  
 and has its principal place of business in (name) NA.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

NA

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I request compensatory and punitive damages Against all defendants jointly and severally of 400,000

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11-7-2024

Signature of Plaintiff

Printed Name of Plaintiff

James Thornton  
James Thornton

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

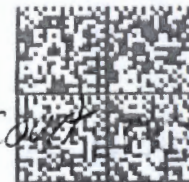
Telephone Number

E-mail Address

Thornton James  
COOS COUNTY Ill  
CORRECTIONS  
200 EAST 2ND STR.  
COQUILLE, OR 97423

LEGAL MAIL

United States District Court  
District of Oregon  
Office of the Clerk  
Wayne L Morse United States Courthouse  
405 East 8th Avenue Suite 2100  
Eugene OR 97401



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